

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

Robyn E. Bladow
To Call Writer Directly:
+1 213 680 8634
robyn.bladow@kirkland.com

555 South Flower Street
Los Angeles, CA 90071
United States
+1 213 680 8400
www.kirkland.com

Facsimile:
+1 213 680 8500

April 27, 2022

VIA ECF

Hon. Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
Room 1960
New York, NY 10007

Re: *Tipsy Nail Club LLC, et al. v. ClassPass Inc. et al.*,
Case No. 21-cv-08662 (AT) (SN)

Dear Judge Torres:

We represent Defendants in the above-referenced action and write to inform the Court of the parties' upcoming mediation and to request a brief extension to the case deadlines to allow the parties to focus on and prepare for a successful mediation and avoid spending time and resources on voluminous document productions and review, and related discovery matters (including potential discovery disputes). The mediation is scheduled for June 3, 2022, before Judge Suzanne Segal (Ret.). Accordingly, Defendants submit this unopposed request for a 45-day extension of all relevant case deadlines, which are reflected below, along with the proposed extensions (adjusted to account for any weekends or holidays).

	Original Deadline	45-Day Extension
Requests to Admit	June 15, 2022	August 1, 2022
Substantial Completion of Document Discovery	July 11, 2022	August 25, 2022
Fact Discovery	August 29, 2022	October 13, 2022
Completion of Depositions	August 29, 2022	October 13, 2022

KIRKLAND & ELLIS LLP

Hon. Analisa Torres
April 27, 2022
Page 2

Expert Discovery	October 24, 2022	December 8, 2022
-------------------------	------------------	------------------

This is the parties' first requested extension to these case deadlines.

Respectfully submitted,

/s/ Robyn E. Bladow

Robyn E. Bladow

cc: All Counsel of Record via ECF